

**IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION**

UNITED STATES OF AMERICA)
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JEFFREY DOUGLAS COSBY)

Case No.: 3:06cr151-MEF

**UNOPPOSED MOTION FOR EXTENSION
OF TIME TO FILE PRETRIAL MOTIONS**

COMES NOW the Defendant, Jeffrey D. Cosby, by and through undersigned counsel, Kevin L. Butler, and requests a two day extension of time to file pretrial motions. In support of this motion undersigned counsel states:

1. Mr. Cosby is charged with attempting to persuade, induce, entice and coerce a minor into engaging in sexual conduct for the purpose recording and then providing the images to others through interstate commerce in violation of 18 U.S.C. § 2251(a).
2. Mr. Cosby has a previous conviction for similar conduct and if convicted of this offense may receive a mandatory sentence of not less than 25 years.
3. In light of the severity of punishment and the fact that undersigned counsel has pretrial motions due in multiple other cases on this date, an additional day is necessary to complete the review of this matter for pretrial motions.
4. The government has no objection to this requested continuance.
5. The defense does not object to any extension necessary for the government to respond to any defense motions.

WHEREFORE, the defendant prays that he be allowed until Monday, July 17, 2006, to file pretrial motions in this matter.

Dated this 13th day of July 2006.

Respectfully submitted,
s/ Kevin L. Butler
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v.

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CERTIFICATE OF SERVICE

I hereby certify that on July 13, 2006, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Susan Redmond, Assistant United States Attorney.

Respectfully submitted,

s/ Kevin L. Butler
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